

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

SIMPLE HEALTH PLANS LLC, et al.,

Defendants.

Case No.: 18-cv-62593-DPG

DEFENDANT'S NOTICE OF COMPLIANCE

Pursuant to the Court's order dated October 25, 2019 [DE 224], attached is Defendant Steven Dorfman's Statement.

Dated: October 30, 2019

DLA Piper LLP (US)

/s/ Jordan Ziegler

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Counsel for Defendant

Steven Dorfman

CERTIFICATE OF SERVICE

The undersigned certifies that he filed this pleading through the court's electronic filing system and that all parties requesting electronic notice of pleadings have been served with the pleading.

/s/ Jordan Ziegler

Jordan A. Ziegler

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**DEFENDANT STEVEN DORFMAN'S STATEMENT OF
EFFORTS TO OBTAIN EMPLOYMENT AND MONTHLY LIVING EXPENSES**

Pursuant to the Court's order dated October 25, 2019, I, Steven Dorfman, submit this statement of my efforts to obtain employment since the Court's hearing on June 20, 2019 and of my monthly living expenses:

1. In light of the temporary restraining order imposing a receivership and an asset freeze restraining all of my personal and corporate assets (the "Asset Freeze"), which was extended by that the Court's preliminary injunction, I am unable to obtain employment.

2. The Federal Trade Commission ("FTC") alleges that I engaged in a systematic effort to defraud and deceive my customers. Both the FTC and press have widely publicized these scurrilous allegations. The result of this action and the publicity surrounding it is that I have lost any real potential to seek and obtain employment. Indeed, an Internet search of my name returns dozens of links to articles that mechanically adopt the FTC's allegations as fact, impugning my character.

3. Pursuant to the Asset Freeze, the Court has imposed financial restrictions on my ability to have bank accounts or to transact in money or other assets. As a result of these restrictions, any employer that chose to hire me would have to develop special payment

arrangements consistent with the asset freeze imposed over all of my assets. This would require the prospective employer to hire counsel to evaluate its potential exposure from this case and subject that employer to additional operating costs and ongoing harassment by the FTC enforcement staff.

4. Furthermore, my credit score—a significant metric employers use to evaluate employee applicants—has been adversely affected by this action.

5. For these reasons, I do not have a realistic opportunity to obtain legal employment.

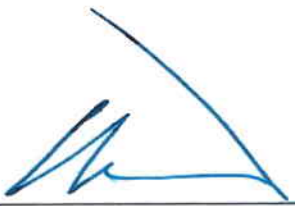
6. Currently, my family's living expenses include shelter, food, and other ordinary expenses. However, as a result of this proceeding and the FTC's publicized allegations, we have experienced financial difficulties and are searching for a new residence to reduce expenses.

7. Without my monthly allowance, I would not have sufficient resources to pay for my living expenses.

8. Accordingly, I seek to extend the Court's \$5,000 per month allowance to pay for my basic living expenses.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED ON: October 30, 2019



Steven Dorfman